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**MEMO ENDORSED**

September 22, 2023

The Honorable Valerie Caproni  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. William Washington  
21 CR 603 (VEC)

Dear Judge Caproni:

I am appointed counsel for William Washington pursuant to the Criminal Justice Act.

Mr. Washington's appearance is required in the Southern District of New York on September 26, 2023, at 10:00 a.m. for the purpose of having Mr. Washington resolve this matter pretrial by a guilty plea pursuant to a plea agreement with the Government. We respectfully request that the Court order the United States Marshal's Service to pay the cost of Mr. Washington's airfare to and from the Western District of Washington. This Court has granted similar Transportation Orders in this case, such as the Transportation Order for the co-defendant Ronald Glen Davis. (See, e.g. ECF 21 CR 603, Document No. 104).

As the Court is aware from the Government's prior submissions regarding the co-defendant Terrance Williams, Mr. Washington paid out to Mr. Williams from his personal funds far more than he received from the NBA Health and Welfare Benefit Plan. His financial situation remains dire and financial assistance is necessary for him to be personally present for the anticipated guilty plea in this case next week on September 26, 2023.

I attach a Proposed Order for the Courts consideration.

Respectfully,



Scott B. Tulman

SBT:ss

The United States Marshals Service is ordered to furnish Dr. Washington with the funds to cover the cost of one-way airfare between the Western District of Washington and New York City or Newark, New Jersey in advance of his upcoming court appearance on September 26, 2023. Defense counsel is hereby authorized to seek reimbursement for Dr. Washington's return flight through CJA funding.

SO ORDERED.



09/22/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE